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April 1, 2014

Via ECF

Hon. Katherine B. Forrest  
United State District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
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**Re: J&N Records, LLC v. Planet Records et al.**  
**12-CV-7265 (KBF) (ECF Case)**

Dear Judge Forrest:

We are counsel to the Defendant and write jointly with Plaintiff to request an extension of the discovery cutoff date from April 1, 2014 to April 8, 2014 for the limited purpose of giving Defendant sufficient time to respond to two of Plaintiff's outstanding discovery requests.

In lieu of Plaintiff taking the deposition of Roberto Ferrante, who resides in Italy, the parties stipulated on March 5, 2014 that Plaintiff would serve Interrogatories on Defendant pursuant to Fed. R. Civ. P. 33. Plaintiff originally served its Interrogatories on March 7, 2014. Shortly thereafter Plaintiff asked to serve amended interrogatories to which Defendant consented. Plaintiff served its amended Interrogatories on Wednesday, March 26, 2014. On the same day, Plaintiff also identified five categories of documents that Plaintiff believes to be missing from Defendant's document production.

Other than these two limited exceptions, the parties will have completed all discovery in this case on April 1, 2014, including the exchange of documents and the depositions of five (5) witnesses. The parties do not anticipate that the requested one week extension, if granted, will affect any other scheduled deadlines or appearances in this case including the upcoming conference on April 3, 2014.

We thank the Court for its consideration.

Respectfully submitted,  
  
 Mark A. Weissman

*Ordered  
 Application granted.  
 All other dates remain.  
 4/1/14 [initials]*

MAW/ac  
cc: Jon D. Jekielek

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